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ADMITTED TO THE UNITED STATES
SUPREME COURT BAR (1996)

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January 18, 2022

VIA, ELECTRONIC FILINGThe Honorable Jocelyn G. Boyd,
Chief Clerk/Executive Director,
Public Service Commission of South Carolina.

- Re: ● Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC
to Request the Commission to Hold a Joint Hearing with the North Carolina
Utilities Commission to Develop Carbon Plan
- Docket 2021-349-E
- **Opposition to Motion to Recuse**

Ms. Boyd:

The Carolinas Clean Energy Business Association (“CCEBA”), Intervenor in Docket 2021-349-E, submits this letter in opposition to the Motion filed by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively “Duke”) to recuse Commissioner Thomas J. Ervin from participation in this Docket. CCEBA has reviewed the Motion and the Responses filed thereto by other parties, including Google, LLC (“Google”), the Carolina Industrial Group for Fair Utility Rates II and III (“CIGFUR”), and the North Carolina Sustainable Energy Association (“NCSEA”). CCEBA agrees with Google, CIGFUR and NCSEA that Duke’s Motion fails to establish grounds for Commissioner Ervin’s recusal and should be denied. Commissioner Ervin’s comments during the Public Service Commission’s November 18, 2021 special meeting were relevant to the Commission’s consideration of Duke’s proposal for an Allowable *Ex Parte* Briefing and are not grounds for recusal from consideration of Duke’s Petition for Joint Proceeding (“Petition”).

In submitting this letter in response to the Motion to Recuse, CCEBA expressly reserves comment on the underlying Petition until CCEBA submits its comments on or before January 31, 2022, pursuant to this Commission’s earlier Orders in this Docket.

Respectfully Submitted,

/s/Richard L. Whitt

Richard L. Whitt,

*As Counsel for Carolinas Clean Energy
Business Association.*

cc: All parties of Record in Docket 2021-349-E, *via electronic mail*

John D. Burns, General Counsel for CCEBA, *via electronic mail*